

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
<i>ex rel.</i> John King & Tammy Drummond	§	
and John King & Tammy Drummond,	§	
Individually, <i>et al.</i>	§	
Plaintiffs,	§	CIVIL ACTION No. 06-2662
v.	§	TRANSFERRED FROM EASTERN
	§	DISTRICT OF PENNSYLVANIA
	§	
SOLVAY S.A. <i>et al.</i> ,	§	CIVIL ACTION No. 03-3561
	§	
Defendants.	§	

**SUPPLEMENTAL DECLARATION OF JOEL M. ANDROPHY**

I, Joel M. Androphy, declare as follows:

1. After the Court's ruling on March 3, 2015, I reviewed my billing sheets because I felt certain the FDA would never have allowed two of its agents (Mark Supple and Michael Cummins) to travel to Houston from the DC area unless they knew what our case was about in advance. In fact, in my 20 years of experience in *qui tam* litigation, even local agents have not met with us without first discussing allegations at length.
2. My billing records, entered concurrently with the event, state that on March 27, 2003, I spent 1.5 hours reviewing documents John King provided to us and discussing our allegations with Agent Supple. That was more than 2 months before I filed the *qui tam* case on June 10, 2003. See Exhibit A, Androphy Billing Records. I do not have an independent memory of the call, but there was no other purpose than to encourage the FDA to investigate the allegations about the three drugs at issue in this case, including off-label marketing and kickbacks.
3. I spoke to the FDA investigators three other times before the June 9 meeting in Houston about which I earlier attested, on June 2, 4, and 5, 2003. See Exhibit A, Androphy billing records. I do not recall the length of the discussions, but these conversations would have discussed allegations in more detail as I was in the process of preparing the complaint, a formal disclosure statement, organizing my exhibits, and preparing a power point presentation for the meeting with the FDA. My time entries substantiate the hours of total preparation and discussion.

4. I have just read Lori King's declaration of March 12 in this case. Before I heard from John King on March 6, 2015, about the information Lori details in this declaration, I did not know about the existence of John King's multiple substantive conversations with FBI agents during this time period. I did speak with the Relators regarding the communications with the Government they remembered, and also searched firm files and emails for pertinent information about any disclosures during this early time frame. John King did not remember the conversations at that point, and we have no record of them in our files or emails.
5. I declare under penalty of perjury that the foregoing is true and correct.

3-12-15

Dated



Joel M. Androphy

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Selection Criteria			
Client Selection	Include: King		
Acti. Selection	Include: Contingent Fee; Preparation; Referral Fee; Retainer		
Slip. Date	1/1/2003 - 12/31/2003		
Slip. Classification	Open		

Rate Info - identifies rate source and level

Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
20695	Lance	3.00	195.00	585.00
1/21/2003	Preparation	0.00	C@10	
WIP	King	0.00		
Whistleblower/retaliation statute reasearch for King file.				
20730	JMA	2.50	895.00	2237.50
1/23/2003	Preparation	0.00	C@1	
WIP	King	2.50		
Visit with client				
20734	JMA	8.00	895.00	7160.00
1/25/2003	Preparation	0.00	C@1	
WIP	King	8.00		
Visit with client				
20738	JMA	1.00	895.00	895.00
1/25/2003	Preparation	0.00	C@1	
WIP	King	1.00		
Telephone conference with counsel regarding facts/law				
20767	Lance	1.00	195.00	195.00
1/23/2003	Preparation	0.00	C@10	
WIP	King	0.00		
King - read complaint, conference with JMA, research.				
20769	Lance	1.00	195.00	195.00
1/27/2003	Preparation	0.00	C@10	
WIP	King	0.00		
King - Researched Retaliation claim, wrote memo.				
20770	Lance	2.75	195.00	536.25
1/27/2003	Preparation	0.00	C@10	
WIP	King	0.00		
King - Researched Retaliation claim, wrote memo, conference call with client.				

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
20773 1/28/2003 WIP King - read materials on Medicaid, Medicare, cleint materials.	Lance Preparation King	1.50 0.00 0.00 0.00	195.00 C@10	292.50
20805 1/27/2003 WIP Telephone conference with client and co-counsel; review file	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
20853 1/29/2003 WIP Read client materials, preparation of Disclosure Statement	Lance Preparation King	3.25 0.00 0.00 0.00	195.00 C@10	633.75
20858 2/3/2003 WIP King - conference with JMA and Mark Kleiman, researched case law.	Lance Preparation King	3.00 0.00 0.00 0.00	195.00 C@10	585.00
20877 2/3/2003 WIP Status conference regarding legal issues and telephone conference with co-counsel; review case law regarding public disclosure and original source; conference regarding fee agreement	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
20886 2/4/2003 WIP Legal issues; telephone conference with Kleiman	JMA Preparation King	0.50 0.00 0.50 0.00	895.00 C@1	447.50
20889 2/5/2003 WIP Review emails and documents	JMA Preparation King	0.50 0.00 0.50 0.00	895.00 C@1	447.50
20900 2/6/2003 WIP Telephone conference with Brewsters and P. King	JMA Preparation King	0.50 0.00 0.50 0.00	895.00 C@1	447.50

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Info Bill Status	Slip Value
20926 1/29/2003 WIP Preparation of Disclosure Statement.	Lance Preparation King	3.25 0.00 0.00 0.00	195.00 C@10	633.75
20930 2/3/2003 WIP Researched case law, conference with JMA and Mark Kleiman.	Lance Preparation King	3.00 0.00 0.00 0.00	195.00 C@10	585.00
21067 2/12/2003 WIP Summarized disclosure documents.	Lance Preparation King	4.25 0.00 0.00 0.00	195.00 C@10	828.75
21068 2/13/2003 WIP Summarized disclosure documents.	Lance Preparation King	2.75 0.00 0.00 0.00	195.00 C@10	536.25
21069 2/16/2003 WIP Conference with JMA and Mark Kleiman.	Lance Preparation King	5.00 0.00 0.00 0.00	195.00 C@10	975.00
21125 2/11/2003 WIP Review case law	JMA Preparation King	0.50 0.00 0.50 0.00	895.00 C@1	447.50
21141 2/14/2003 WIP Review issues	JMA Preparation King	1.00 0.00 1.00 0.00	895.00 C@1	895.00
21297 2/17/2003 WIP Meeting with JMA, Mark Kleiman and Leslie; work on damage models; review of disclosure documents.	Lance Preparation King	7.75 0.00 0.00 0.00	195.00 C@10	1511.25
21299 2/18/2003 WIP Review of disclosure documents; prepared memo on damage models.	Lance Preparation King	2.75 0.00 0.00 0.00	195.00 C@10	536.25
21301 2/19/2003 WIP	Lance Preparation King	1.00 0.00 0.00	195.00 C@10	195.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
Phone conference with Stephanie Kleiman; preparation for trip to Florida.				
21305	Lance	14.00	195.00	2730.00
2/21/2003	Preparation	0.00	C@10	
W/IP	King	0.00		
Travel to Pensacola, meeting with Tammy Drummond, reviewed disclosure documents, return travel to Houston.				
21352	Lesley H	3.50	295.00	1032.50
2/17/2003	Preparation	0.00	C@3	
W/IP	King	3.50		
Analyze medicaid and medicare issues				
21378	JMA	5.00	895.00	4475.00
2/16/2003	Preparation	0.00	C@1	
W/IP	King	5.00		
Review liability theories; meeting with Kleiman to discuss liability and drugs				
21379	JMA	6.00	895.00	5370.00
2/17/2003	Preparation	0.00	C@1	
W/IP	King	6.00		
Review liability theories; meeting with Kleiman to discuss liability and drugs; review theories with client				
21386	JMA	1.00	895.00	895.00
2/18/2003	Preparation	0.00	C@1	
W/IP	King	1.00		
Review emails regarding different drugs				
21392	JMA	0.50	895.00	447.50
2/19/2003	Preparation	0.00	C@1	
W/IP	King	0.50		
Review documents				
21399	JMA	1.00	895.00	895.00
2/20/2003	Preparation	0.00	C@1	
W/IP	King	1.00		
Review documents and telephone conference with witness				
21404	JMA	2.00	895.00	1790.00
2/21/2003	Preparation	0.00	C@1	
W/IP	King	2.00		
Review documents and telephone conference with new relator				



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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Info Bill Status	Slip Value
21407 2/22/2003 WIP Review factual and legal issues	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
21408 2/23/2003 WIP Review factual and legal issues	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
21455 2/28/2003 WIP Meeting with Tammy Drummond	JMA Preparation King	10.50 0.00 10.50 0.00	895.00 C@1	9397.50
21578 3/8/2003 WIP Disclosure Statement	Mark Preparation King	2.00 0.00 2.00 0.00	395.00 C@4	790.00
21609 3/3/2003 WIP Review file; telephone conference with Mark Kleiman and client, emails with client regarding causes of action	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
21611 3/4/2003 WIP Telephone conference with client regarding litigation issues and bars to recovery	JMA Preparation King	2.50 0.00 2.50 0.00	895.00 C@1	2237.50
21617 3/5/2003 WIP Review legal issues	JMA Preparation King	2.50 0.00 2.50 0.00	895.00 C@1	2237.50
21623 3/6/2003 WIP Review legal issues regarding public disclosure and original source	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
21660 3/10/2003 WIP Preparation of disclosure statement	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Info Bill Status	Slip Value
21661 3/12/2003 WIP Preparation of disclosure statement	Mark Preparation King	9.00 0.00 9.00 0.00	395.00 C@4	3555.00
21670 2/26/2003 WIP Review disclosure documents.	Lance Preparation King	3.75 0.00 0.00 0.00	195.00 C@10	731.25
21672 2/27/2003 WIP Review disclosure documents.	Lance Preparation King	3.50 0.00 0.00 0.00	195.00 C@10	682.50
21673 2/28/2003 WIP Travel to Pensacola, meeting with Tammy Drummond.	Lance Preparation King	12.00 0.00 0.00 0.00	195.00 C@10	2340.00
21675 3/8/2003 WIP Meeting with Mark Correrro, review of case documents.	Lance Preparation King	2.00 0.00 0.00 0.00	195.00 C@10	390.00
21677 3/11/2003 WIP Review and organization of disclosure documents.	Lance Preparation King	4.50 0.00 0.00 0.00	195.00 C@10	877.50
21678 3/12/2003 WIP Drafting of disclosure statement.	Lance Preparation King	4.50 0.00 0.00 0.00	195.00 C@10	877.50
21679 3/13/2003 WIP Drafting of disclosure statement.	Lance Preparation King	6.75 0.00 0.00 0.00	195.00 C@10	1316.25
21704 3/10/2003 WIP Review legal issues	JMA Preparation King	1.00 0.00 1.00 0.00	895.00 C@1	895.00
21719 3/13/2003 WIP Conference regarding disclosures regarding	JMA Preparation King	1.00 0.00 1.00 0.00	895.00 C@1	895.00



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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB	Rate Info	
Posting Status	Client	Time	Bill Status	
Description	Reference	Est. Time		
statement, review emails and documents				
21720	JMA	1.50	895.00	1342.50
3/14/2003	Preparation	0.00	C@1	
WIP	King	1.50		
Issues regarding pending federal litigation and disclosure statement				
21843	Elizabeth	1.00	395.00	395.00
3/17/2003	Preparation	0.00	C@4	
WIP	King	1.00		
Draft release for Henry Brewster				
21947	Mark	3.00	395.00	1185.00
3/17/2003	Preparation	0.00	C@4	
WIP	King	3.00		
Preparation of disclosure statement				
21949	Mark	10.00	395.00	3950.00
3/11/2003	Preparation	0.00	C@4	
WIP	King	10.00		
Preparation of disclosure statement				
21951	Mark	7.00	395.00	2765.00
3/13/2003	Preparation	0.00	C@4	
WIP	King	7.00		
Preparation of Disclosure				
21981	JMA	2.50	895.00	2237.50
3/21/2003	Preparation	0.00	C@1	
WIP	King	2.50		
Review disclosure statement and documents				
21984	JMA	2.00	895.00	1790.00
3/23/2003	Preparation	0.00	C@1	
WIP	King	2.00		
Review disclosure and supporting documents				
22009	Lance	1.75	195.00	341.25
3/14/2003	Preparation	0.00	C@10	
WIP	King	1.75		
Disclosure statement				
22010	Lance	1.00	195.00	195.00
3/14/2003	Preparation	0.00	C@10	
WIP	King	1.00		
Conference with Joel Androphy and Mark Kleiman				

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Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Info Bill Status	Slip Value
22011	3/14/2003 WIP Disclosure	Lance Preparation King	2.50 0.00 2.50 0.00	195.00 C@10	487.50
22012	3/16/2003 WIP Disclosure	Lance Preparation King	4.00 0.00 4.00 0.00	195.00 C@10	780.00
22013	3/17/2003 WIP Disclosure	Lance Preparation King	5.50 0.00 5.50 0.00	195.00 C@10	1072.50
22014	3/18/2003 WIP Disclosure	Lance Preparation King	1.00 0.00 1.00 0.00	195.00 C@10	195.00
22015	3/19/2003 WIP Disclosure	Lance Preparation King	2.00 0.00 2.00 0.00	195.00 C@10	390.00
22132	3/24/2003 WIP Review exhibits and disclosure.	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
22143	3/27/2003 WIP Telephone conference with FDA and review documents.	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
22269	3/24/2003 WIP Disclosure.	Lance Preparation King	3.50 0.00 3.50 0.00	195.00 C@10	682.50
22597	4/7/2003 WIP Review documents.	JMA Preparation King	1.00 0.00 1.00 0.00	895.00 C@1	895.00
22707	4/23/2003 WIP Review the drug war document.	Mark Preparation King	0.75 0.00 0.75 0.00	395.00 C@4	296.25

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Info Bill Status	Slip Value
22711 4/28/2003 WIP Create a King_Drummond Index that will be a topical index.	Mark Preparation King	3.00 0.00 3.00 0.00	395.00 C@4	1185.00
22712 4/30/2003 WIP Create a King_Drummond Index that will be a topical index.	Mark Preparation King	5.00 0.00 5.00 0.00	395.00 C@4	1975.00
22780 4/29/2003 WIP Telephone conference with client.	JMA Preparation King	0.30 0.00 0.30 0.00	895.00 C@1	268.50
23047 5/15/2003 WIP Organize case documents in preparation for filing complaint.	Tracy Preparation King	8.00 0.00 8.00 0.00	195.00 C@16	1560.00
23048 5/16/2003 WIP Complete organization of case documents.	Tracy Preparation King	7.00 0.00 7.00 0.00	195.00 C@16	1365.00
23049 5/2/2003 WIP King_Drummond Index	Mark Preparation King	4.00 0.00 4.00 0.00	395.00 C@4	1580.00
23050 5/17/2003 WIP King Disclosure	Mark Preparation King	1.00 0.00 1.00 0.00	395.00 C@4	395.00
23051 5/19/2003 WIP King Disclosure	Mark Preparation King	9.00 0.00 9.00 0.00	395.00 C@4	3555.00
23052 5/20/2003 WIP King Disclosure	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
23053 5/21/2003 WIP King Disclosure	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00
23082 5/14/2003 WIP Prepare for meeting and for amended draft disclosure statement.	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
23088 5/17/2003 WIP Preparation for meeting.	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
23091 5/23/2003 WIP Review legal articles regarding false labeling issues.	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
23092 5/18/2003 WIP Preparation for disclosure.	JMA Preparation King	4.00 0.00 4.00 0.00	895.00 C@1	3580.00
23093 5/19/2003 WIP Preparation for filing of complaint and disclosure statement-review exhibits.	JMA Preparation King	8.00 0.00 8.00 0.00	895.00 C@1	7160.00
23096 5/20/2003 WIP Review disclosure materials.	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
23100 5/21/2003 WIP Review disclosure materials.	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
23105 5/22/2003 WIP Review disclosure materials.	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
23108 5/19/2003 WIP Attend meeting with Mark Kleiman; assist with	Tracy Preparation King	9.00 0.00 9.00 0.00	195.00 C@16	1755.00

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Info Bill Status	Slip Value
23110 5/20/2003 WIP Draft witness list; continue assisting with preparation of disclosure.	Tracy Preparation King	7.00 0.00 7.00 0.00	195.00 C@16	1365.00
23114 5/21/2003 WIP Review documents provided by Drummond in preparation for disclosures.	Tracy Preparation King	5.00 0.00 5.00 0.00	195.00 C@16	975.00
23266 5/25/2003 WIP Review legal issues regarding claims.	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
23269 5/26/2003 WIP Review disclosure key documents and telephone conference with co-counsel.	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
23271 5/27/2003 WIP Review disclosure exhibits and legal issues.	JMA Preparation King	3.50 0.00 3.50 0.00	895.00 C@1	3132.50
23275 5/28/2003 WIP Preparation of disclosure statement and complaint; telephone conference with clients.	JMA Preparation King	4.00 0.00 4.00 0.00	895.00 C@1	3580.00
23311 5/28/2003 WIP Assist with preparation of complaint and Pro Hac Vices.	Tracy Preparation King	5.00 0.00 5.00 0.00	195.00 C@16	975.00
23316 5/29/2003 WIP Assist with preparation of complaint.	Tracy Preparation King	4.50 0.00 4.50 0.00	195.00 C@16	877.50
23317 5/30/2003 WIP Assist with preparation of complaint.	Tracy Preparation King	1.50 0.00 1.50 0.00	195.00 C@16	292.50

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
23319 5/22/2003 WIP Disclosure.	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00
23320 5/23/2003 WIP Binder.	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00
23321 5/27/2003 WIP Legal theories and binder.	Mark Preparation King	10.00 0.00 10.00 0.00	395.00 C@4	3950.00
23322 5/28/2003 WIP Legal theories and binder.	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00
23323 5/29/2003 WIP Complaint, binder and disclosure statement.	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00
23324 5/30/2003 WIP Complaint, binder and disclosure statement.	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00
23464 6/2/2003 WIP Assisted in disclosure statement.	Becky Preparation King	1.00 0.00 1.00 0.00	195.00 C@5	195.00
23465 6/3/2003 WIP Continued in preparing disclosure statement and table of contents.	Becky Preparation King	2.00 0.00 2.00 0.00	195.00 C@5	390.00
23468 6/5/2003 WIP Update witness list; assist with preparation of disclosure.	Tracy Preparation King	3.50 0.00 3.50 0.00	195.00 C@16	682.50
23471 6/6/2003 WIP Assist with preparation of disclosure for service.	Tracy Preparation King	2.25 0.00 2.25 0.00	195.00 C@16	438.75

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
23476 6/2/2003 WIP	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
Review complaint and disclosure statement and state issues; review case and statutory law; telephone conference with FDA.				
23478 6/3/2003 WIP	JMA Preparation King	2.50 0.00 2.50 0.00	895.00 C@1	2237.50
Preparation of complaint and disclosure; review statutory of case law; telephone conference with client.				
23483 6/4/2003 WIP	JMA Preparation King	3.00 0.00 3.00 0.00	895.00 C@1	2685.00
Telephone conference with FDA, review exhibits for the disclosure statement.				
23488 6/5/2003 WIP	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
Review power point, exhibits and telephone conference with FDA and co-counsel.				
23491 6/6/2003 WIP	JMA Preparation King	3.50 0.00 3.50 0.00	895.00 C@1	3132.50
Review power point of disclosure exhibits.				
23518 6/3/2003 WIP	Thomas Preparation King	4.50 0.00 0.00 0.00	395.00 C@4	1777.50
Met with MC to discuss powerpoint presentation for FDA meeting. Developed presentation.				
23519 6/4/2003 WIP	Thomas Preparation King	7.50 0.00 0.00 0.00	395.00 C@4	2962.50
Met with MC to discuss powerpoint presentation for FDA meeting. Developed presentation.				
23520 6/5/2003 WIP	Thomas Preparation King	3.50 0.00 0.00 0.00	395.00 C@4	1382.50
Developed presentation, met with MC and JMA.				



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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
23522 6/6/2003 WIP Developed presentation, met with MC and JMA.	Thomas Preparation King	0.50 0.00 0.00 0.00	395.00 C@4	197.50
23570 6/2/2003 WIP King Complaint & Disclosure Statement	Mark Preparation King	7.00 0.00 7.00 0.00	395.00 C@4	2765.00
23571 6/3/2003 WIP King Complaint & Power Point	Mark Preparation King	8.00 0.00 8.00 0.00	395.00 C@4	3160.00
23572 6/4/2003 WIP King Complaint & Power Point	Mark Preparation King	5.00 0.00 5.00 0.00	395.00 C@4	1975.00
23573 6/4/2003 WIP Binder of Qui Tam Law	Mark Preparation King	3.00 0.00 3.00 0.00	395.00 C@4	1185.00
23574 6/5/2003 WIP Phone Conversation with John King	Mark Preparation King	1.10 0.00 1.10 0.00	395.00 C@4	434.50
23575 6/5/2003 WIP Binder of Qui Tam Law	Mark Preparation King	3.00 0.00 3.00 0.00	395.00 C@4	1185.00
23576 6/5/2003 WIP King Complaint and Disclosure Statement	Mark Preparation King	5.00 0.00 5.00 0.00	395.00 C@4	1975.00
23577 6/6/2003 WIP King Complaint and Disclosure Statement	Mark Preparation King	9.00 0.00 9.00 0.00	395.00 C@4	3555.00
23578 6/9/2003 WIP Meeting with the FDA, John King, and Tammy Drummond	Mark Preparation King	9.50 0.00 9.50 0.00	395.00 C@4	3752.50

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Info Bill Status	Slip Value
23614 6/13/2003 WIP Memo for Joel on Southland.	Mark Preparation King	3.00 0.00 3.00 0.00	395.00 C@4	1185.00
23615 6/16/2003 WIP Update and correct power point presentation for Phil.	Mark Preparation King	2.00 0.00 2.00 0.00	395.00 C@4	790.00
23632 6/8/2003 WIP Preparation for FDA meeting.	JMA Preparation King	2.50 0.00 2.50 0.00	895.00 C@1	2237.50
23633 6/9/2003 WIP Meeting with FDA and preparation of complaint.	JMA Preparation King	10.00 0.00 10.00 0.00	895.00 C@1	8950.00
23639 6/11/2003 WIP Review of supplemental materials.	JMA Preparation King	1.00 0.00 1.00 0.00	895.00 C@1	895.00
23641 6/12/2003 WIP Review of supplemental materials.	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
23645 6/13/2003 WIP Review supplemental materials and issues.	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
23647 6/9/2003 WIP Prepare complaint for filing.	Tracy Preparation King	5.00 0.00 5.00 0.00	195.00 C@16	975.00
23651 6/10/2003 WIP Prepare and forward disclosure statement to US Attorney in Philadelphia and Department of Justice in Washington D.C.	Tracy Preparation King	4.00 0.00 4.00 0.00	195.00 C@16	780.00
23656 6/12/2003 WIP Forward complaint to Department of Justice in	Tracy Preparation King	1.50 0.00 1.50 0.00	195.00 C@16	292.50

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
Washington, D.C. and US Attorney in Philadelphia.				
23763	JMA	1.00	895.00	895.00
6/17/2003	Preparation	0.00	C@1	
WIP	King	1.00		
Review supplemental documents.				
23814	Mark	3.00	395.00	1185.00
6/16/2003	Preparation	0.00	C@4	
WIP	King	3.00		
Analyze J. King's performance reviews.				
23854	Karen B	1.00	195.00	195.00
6/13/2003	Preparation	0.00	C@5	
WIP	King	1.00		
Assemble operative documents regarding Case status. Compile documents in anticipation of supplementing disclosure.				
23866	Karen B	0.50	195.00	97.50
6/18/2003	Preparation	0.00	C@5	
WIP	King	0.50		
Coordinate regarding potential supplemental to disclosure.				
24123	JMA	1.50	895.00	1342.50
7/3/2003	Preparation	0.00	C@1	
WIP	King	1.50		
Telephone conference with AUSA review disclosure materials.				
24470	Tracy	0.83	195.00	162.50
7/17/2003	Preparation	0.00	C@16	
WIP	King	0.83		
Assist with filing of First Supplemental Disclosure				
24582	JMA	1.00	895.00	895.00
7/29/2003	Preparation	0.00	C@1	
WIP	King	1.00		
Telephone conference with King family and AUSA				
24583	JMA	1.50	895.00	1342.50
8/1/2003	Preparation	0.00	C@1	
WIP	King	1.50		
Preparation for meeting with AUSA review disclosure				
		0.00		

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
24593	Lance	1.00	195.00	195.00
7/3/2003	Preparation	0.00	C@10	
WIP	King	1.00		
Reviewing documents		0.00		
24608	Karen B	8.00	195.00	1560.00
7/29/2003	Preparation	0.00	C@5	
WIP	King	8.00		
Prepare for DOJ meeting re: travel logistics and relevant documents		0.00		
25078	JMA	2.50	895.00	2237.50
8/25/2003	Preparation	0.00	C@1	
WIP	King	2.50		
Prepare for hearing with government.		0.00		
25079	JMA	2.00	895.00	1790.00
8/26/2003	Preparation	0.00	C@1	
WIP	King	2.00		
Prepare for meeting.		0.00		
25080	JMA	3.50	895.00	3132.50
8/27/2003	Preparation	0.00	C@1	
WIP	King	3.50		
Prepare for meeting.		0.00		
25081	JMA	2.00	895.00	1790.00
8/28/2003	Preparation	0.00	C@1	
WIP	King	2.00		
Prepare for meeting.		0.00		
25115	Thomas	4.00	395.00	1580.00
8/27/2003	Preparation	0.00	C@4	
WIP	King	4.00		
Preparation of powerpoint for meeting with USA.		0.00		
25117	Thomas	8.00	395.00	3160.00
8/28/2003	Preparation	0.00	C@4	
WIP	King	8.00		
Preparation of powerpoint presentation for meeting with AUSA. Meeting with Joel and review.		0.00		
25119	Thomas	2.00	395.00	790.00
8/29/2003	Preparation	0.00	C@4	
WIP	King	2.00		
Preparation of powerpoint and setting up of computer for presentation.		0.00		

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
25304 9/5/2003 WIP Review materials regards to disclosure issues	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
25468 9/10/2003 WIP Telephone conference with co-counsel	JMA Preparation King	0.25 0.00 0.25 0.00	895.00 C@1	223.75
25476 9/18/2003 WIP Telephone conference with client. Review disclosure issues	JMA Preparation King	1.50 0.00 1.50 0.00	895.00 C@1	1342.50
25567 9/24/2003 WIP Subpoena research to get gov't infor for Bogart.	Mark Preparation King	0.50 0.00 0.50 0.00	395.00 C@4	197.50
25570 9/29/2003 WIP Visit with JMA about damage model.	Mark Preparation King	0.25 0.00 0.25 0.00	395.00 C@4	98.75
25596 8/27/2003 WIP Sales figures	Jessica Preparation King	1.00 0.00 1.00 0.00	195.00 C@5	195.00
25597 8/28/2003 WIP Sales figures	Jessica Preparation King	1.00 0.00 1.00 0.00	195.00 C@5	195.00
25690 10/16/2003 WIP Prepare for government meeting	JMA Preparation King	2.50 0.00 2.50 0.00	895.00 C@1	2237.50
25691 10/17/2003 WIP Prepare for power point. Prepare for meeting. Review documents disclosures	JMA Preparation King	3.00 0.00 3.00 0.00	895.00 C@1	2685.00
25692 10/18/2003 WIP Prepare for meeting	JMA Preparation King	3.00 0.00 3.00 0.00	895.00 C@1	2685.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
25861	Thomas	3.00	395.00	1185.00
10/17/2003	Preparation	0.00	C@4	
WIP	King	3.00		
		0.00		
Assistance in setting up damages models and preparation for meeting with Department of Justice and FDA and client				
25862	Thomas	5.00	395.00	1975.00
10/20/2003	Preparation	0.00	C@4	
WIP	King	5.00		
		0.00		
Meeting with Department of Justice and FDA and clients to review and discuss case				
26002	Tracy	5.00	195.00	975.00
10/14/2003	Preparation	0.00	C@16	
WIP	King	5.00		
		0.00		
Prepare damages charts				
26003	Tracy	3.50	195.00	682.50
10/16/2003	Preparation	0.00	C@16	
WIP	King	3.50		
		0.00		
Prepare for meeting with U.S. Attorneys				
26009	Tracy	3.00	195.00	585.00
10/17/2003	Preparation	0.00	C@16	
WIP	King	3.00		
		0.00		
Assist with preparation for meeting with U.S. Attorneys				
26012	Mark	1.85	395.00	730.75
10/1/2003	Preparation	0.00	C@4	
WIP	King	1.85		
		0.00		
Subpoena memo to get what information the DOJ has.				
26016	Mark	1.00	395.00	395.00
10/2/2003	Preparation	0.00	C@4	
WIP	King	1.00		
		0.00		
Memo. on limits of disclosure of DOJ subpoena material.				
26017	Mark	1.50	395.00	592.50
10/6/2003	Preparation	0.00	C@4	
WIP	King	1.50		
		0.00		
Memo. on limits of disclosure of DOJ subpoena material.				
26019	Mark	0.50	395.00	197.50
10/8/2003	Preparation	0.00	C@4	
WIP	King	0.50		
		0.00		
Memo. on limits of disclosure of DOJ subpoena material.				

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
26022	Mark	0.10	395.00	39.50
10/13/2003	Preparation	0.00	C@4	
WIP	King	0.10		
Left message with j. king to call re: king meeting				
10/20/03.				
26023	Mark	0.75	395.00	296.25
10/13/2003	Preparation	0.00	C@4	
WIP	King	0.75		
telephone call with mark k. re: king meeting				
10/20/03.				
26025	Mark	0.60	395.00	237.00
10/15/2003	Preparation	0.00	C@4	
WIP	King	0.60		
Call j. king about damages.				
26026	Mark	3.00	395.00	1185.00
10/15/2003	Preparation	0.00	C@4	
WIP	King	3.00		
work on damages model.				
26028	Mark	8.00	395.00	3160.00
10/20/2003	Preparation	0.00	C@4	
WIP	King	8.00		
meeting with king/doj/jma/fda . . .				
26064	Lance	8.00	135.00	1080.00
10/20/2003	Preparation	0.00	T	
WIP	King	0.00		
Meeting with government.				
26065	Lance	2.00	135.00	270.00
10/21/2003	Preparation	0.00	T	
WIP	King	0.00		
Prepare supplemental disclosure.				
26068	Lance	1.00	135.00	135.00
10/23/2003	Preparation	0.00	T	
WIP	King	0.00		
Summarized notes from government meeting.				
26069	Lance	1.00	135.00	135.00
10/23/2003	Preparation	0.00	T	
WIP	King	0.00		
Summarized notes from government meeting.				
26073	Lance	4.00	135.00	540.00
10/28/2003	Preparation	0.00	T	
WIP	King	0.00		
Research on DRUGDEX system.				



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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
26074 10/28/2003 W/P Research on DRUGDEX system.	Lance Preparation King	4.00 0.00 0.00 0.00	135.00 T	540.00
26077 10/29/2003 W/P Research into DRUGDEX system.	Lance Preparation King	1.00 0.00 0.00 0.00	135.00 T	135.00
26134 11/3/2003 W/P Research regards: new marketing rules	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
26135 11/7/2003 W/P Review current issues for new disclosure	JMA Preparation King	2.00 0.00 2.00 0.00	895.00 C@1	1790.00
26139 10/20/2003 W/P Meeting with government and clients	JMA Preparation King	8.00 0.00 8.00 0.00	895.00 C@1	7160.00
26140 10/19/2003 W/P Meeting with King and Co-Counsel	JMA Preparation King	1.00 0.00 1.00 0.00	895.00 C@1	895.00
26264 11/6/2003 W/P Draft supplemental disclosure.	Lance Preparation King	1.00 0.00 0.00 0.00	135.00 T@1	135.00
26277 10/20/2003 W/P Assist with preparation for meeting with government	Tracy Preparation King	2.00 0.00 2.00 0.00	195.00 C@16	390.00
26283 10/21/2003 W/P Forward documents to Laemmle	Tracy Preparation King	0.50 0.00 0.50 0.00	195.00 C@16	97.50
26450 10/31/2003 W/P Check for qui tam legal updates. E-mail new press releases to JMA & Mark K.	Mark Preparation King	0.50 0.00 0.50 0.00	395.00 C@4	197.50

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status		Activity	DNB Time	Rate Info	
Description		Client	Est. Time	Bill Status	
	TIME	Reference	Variance		
26454		Mark	2.00	395.00	790.00
11/7/2003		Preparation	0.00	C@4	
WIP		King	2.00		
			0.00		
Finished 4th Disclosure Statement and mailed to Mark K.					
26462		Mark	2.00	395.00	790.00
11/19/2003		Preparation	0.00	C@4	
WIP		King	2.00		
			0.00		
Worked on disclosure statement.					
26489		JMA	1.50	895.00	1342.50
11/18/2003		Preparation	0.00	C@1	
WIP		King	1.50		
			0.00		
Review articles regards to marketing					
26686		Lance	3.00	135.00	405.00
11/18/2003		Preparation	0.00	T@1	
WIP		King	0.00		
			0.00		
Read e-mail attachments on off-label marketing.					
26844		Mark	0.25	395.00	98.75
12/22/2003		Preparation	0.00	C@4	
WIP		King	0.25		
			0.00		
Telephone conversation with Mark K's office, re: 4th Supp. Disclosure					
26845		Mark	3.00	395.00	1185.00
12/29/2003		Preparation	0.00	C@4	
WIP		King	3.00		
			0.00		
Review privileged docs sent by consulting expert.					
26846		Mark	7.00	395.00	2765.00
12/30/2003		Preparation	0.00	C@4	
WIP		King	7.00		
			0.00		
Review Drugdex docs sent from Mark K.					
26847		Mark	6.00	395.00	2370.00
12/31/2003		Preparation	0.00	C@4	
WIP		King	6.00		
			0.00		
Review Drugdex docs sent from Mark K.					
Grand Total					
			Billable	676.28	304340.25
			Unbillable	0.00	0.00
			Total	676.28	304340.25